Before the Federal Communications Commission
> Washington, DC 20554
>
> In the matter of
>
> Primary Status for
> Amateur Radio Operation RM10165 & 10166
> on the Band Segment
> 2300 to 2305 MHz
>
> Comments of
> Al Ward, W5LUA
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> I have been a licensed amateur radio operator since 1965 when I was 15. I presently hold an Extra Class licensee. I primarily operate the microwave frequencies above 902 MHz using weak signal modes such as CW and SSB. I also operate moonbounce or Earth-Moon-Earth Communications (EME) on 902, 1296, 2304, 3456, 5760,10368 and now 24192 MHz. It is very important for us weak signal operators to be able to take advantage of the low noise floor afforded to us by today's low noise PHEMT transistors. Being able to take advantage of the low noise devices is only possible if there is no external man-made interference such as that caused by sharing our amateur bands with spread spectrum, or frequency hopping communication devices or any other interference caused by other non-amateur emitters in the amateur bands.
The level of interference in the 902 to 928 MHz band due to our sharing the band with ISM services has made the band nearly unusable for weak signal work. The same is becoming true of the 5760 MHz band due to sharing with ISM services. The ISM and Part 15 services in the 2400 to 2483 MHz band has also made it a challenge to work with the AMSAT AO-40 S band downlink at 2400 to 2401 MHz. In general, sharing our amateur bands tends to raise the noise floor which severely limits our ability to work weak signals at great distances which is our primary purpose of using this spectrum. Such would be the case if 2300 to 2305 MHz were shared with other services such as AeroAstro. If we were to move higher in frequency from the 2300 to 2305 MHz spectrum such as in the 2390 to 2450 MHz portion of 13 cm, interference from existing ISM, Part 15 and microwave ovens would make using the band very difficult.
I believe it is very important to keep 2300 to 2305 MHz allocated for amateur use only. Amateurs are constantly working on new technological devices that provide lower noise, higher power and more sophisticated antenna systems that allow amateurs to do more propagation studies in this spectrum. I would like to see the FCC raise the allocation status of the 2300 to 2305 MHz spectrum from Secondary to Primary as suggested by the ARRL. I would also like to encourage the FCC to deny the use of this portion of the band by other companies and services such as AeroAstro.
Therefore, I urge the Commission to adopt the ARRL proposal (RM-10165) and

reject that of AeroAstro (RM-10166).

Respectfully submitted:
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